

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Melissa Beck, Sarah Beck, Cherida Brom,
Reginald Holmes, and Alexenderia Romig-
Palodichuk, on behalf of themselves
individually, and all others similarly
situated,

Plaintiffs,

v.

Globe University, Inc., and Minnesota
School of Business, Inc.,

Defendants.

Court File No.: _____

EXHIBIT C

STATE OF MINNESOTA
COUNTY OF WASHINGTON

DISTRICT COURT
TENTH JUDICIAL DISTRICT

Heidi Weber,

Plaintiff,

v.

Minnesota School of Business, Inc. d/b/a
Globe University,

Defendant.

Court File No.: 82-CV-12-2797

Case Type: 7 - Employment

**AFFIDAVIT OF
HANNAH VON BANK**

I, Hannah Von Bank, being first duly sworn upon oath, deposes and states as follows:

1. My name is Hannah Von Bank. I am over twenty-one years of age. This

Affidavit is based upon my personal knowledge and all of the facts recited herein are true and correct.

2. I was an admissions counselor at Defendant from May 2012 to July 2012 at its Lakeville campus.

3. During the course of my employment, I noticed that many powerpoint slides for each program presented ranges of salaries, which were presented to prospective students. All of the programs had either a range or a baseline starting salary like "\$50,000 and up," for example.

4. I can specifically recall the slide for the two-year associates degree in the Business Program. That slide, which was presented to prospective students, had a starting salary range of \$20,000.00 – \$60,000.00 per year for graduates of Defendant.

5. The first three weeks of my job were dedicated admissions training. I, along with other admissions representatives, were trained by Charlie Potter, Primary Trainer at Globe University Corporate.

6. When Potter discussed how to present the starting salary numbers to prospective students, he told us to say that “most people fall in the middle.” Before I ended my employment, I determined this statement and many of the ranges presented to prospective students were fraudulent and misleading because they were not averages. I discovered that \$60,000.00 was an outlier amount and that most graduates made closer to \$20,000.00 – nowhere near the middle. Again, Potter instructed all admissions counselors to represent this range as an average. He told us that it was part of his “tips and tricks.” His statement was not a part of the actual binder presented to admissions trainees.

7. During admissions training, Potter instructed us to target veterans and their families because they fell under the GI bill and had “money at the ready for school.” Potter also instructed us to target low-income persons. He gave the example of the single mom. Potter wanted trainees to target this demographic because those persons were eligible for pell grants from the Government, so it was like “free money” for Defendant. Later, Brian Saintey, Director of Admissions – Lakeville, and Ann Mickelson, Lakeville Campus Director, informed me that this was a general corporate practice.

8. Also during admissions training, Potter instructed admissions trainees to sign up prospective students for financial aid as quickly as possible so the prospective would not have time to think it over.

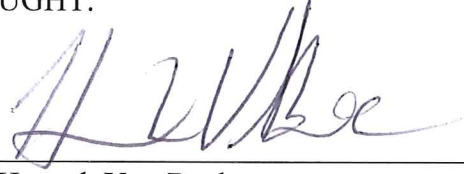
9. I was instructed by Roger Kuhl, Trainer, and Saintey to repeatedly call and “hound” family members of prospective students and say things like, you know Sally would have a great future in business and would make lots of money if she just got an education first and enrolled at Defendant, so have Sally call us back as quickly as possible. Saintey said this was a general corporate practice that needed to be followed.

10. During my employment, I had extremely intense metrics to make my “sales” quotas when enrolling students. Saintey advised me that if I did not make my numbers, I would be fired. In addition, I had intense counseling sessions every two weeks with my superiors in order to make those numbers.

11. Potter instructed the admissions trainees to use “persuasive psychology” to “close” and enroll prospective students. Defendant’s trainers used a technique where they made the school seem exclusive in order to get them to enroll. For example, I would present prospective students with a questionnaire. In one of the questions I asked, “what would you do with all the money you’d make in your new career?” The prospective student would answer something like well I’d get a nice house with hardwood floors and a big backyard, or similar. Then I would ask “well how are you going to make the money to get all that without an education? That’s probably not possible.” And usually, the prospective student would agree.

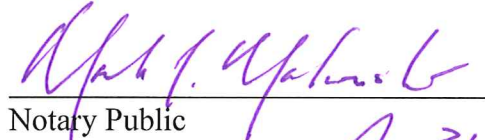
12. In late July 2012, I voluntarily quit my job at Defendant because I believed Defendant’s practices were fraudulent, misleading, and unethical.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



Hannah Von Bank

Subscribed and sworn to before me
this 10th day of July, 2013.



Notary Public

My commission expires:

